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November 27, 2019

**Via ECF**

Hon. Madeline Cox Arleo, USDJ  
United States District Court for the District of New Jersey  
Martin Luther King, Jr. Federal Building, Courtroom 4A  
50 Walnut Street  
Newark, NJ 07102

**RE: RLJ Partners v. Beverly, et. al.**  
**Civil Action No.: 2:19-cv-8589**

Dear Judge Arleo:

The undersigned currently represents the Plaintiffs in the above matter. Presently pending before Your Honor is a motion to dismiss filed by Defendants Joseph Lucosky and Lucosky Bookman. The Plaintiffs' opposition to that motion is currently due Monday December 2, 2019.

Also pending before this Court is a motion I filed today seeking to be relieved as counsel for the Plaintiffs. For the reasons that form the basis for the motion to be relieved as counsel, the undersigned is not in a position to respond to the pending motion to dismiss. Accordingly, I respectfully request that the Court stay the motion to dismiss and all associated deadlines until such time as the Court rules on the motion to be relieved as counsel. I apologize for the vague nature of this request, however providing further detail at this juncture would necessarily involve revealing client confidences. Should the Court require additional details, I would be happy to provide them to the Court confidentially in whatever manner the Court prefers.

I thank the Court for its time and consideration of this request.

Sincerely,

/s/ Robert T. Trautmann  
Robert T. Trautmann, Esq.

CC: Clients